

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JOSEPH COOPER,

Plaintiff,

v.

BRODERICK STEVEN "STEVE" HARVEY

Defendant.

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CAUSE NUMBER: 3:14-cv-04152-B

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Broderick Steven "Steve" Harvey ("Defendant") files this Motion for Summary Judgment (the "Motion for Summary Judgment") and respectfully shows the Court as follows:

As set forth more fully in Defendant's Brief in Support of the Motion for Summary Judgment (the "Brief in Support"), Defendant is entitled to summary judgment on each of Plaintiff's remaining claims. Defendant is also entitled to summary judgment on certain of Defendant's affirmative defenses, as well as on Defendant's claim for attorneys' fees and costs. Each of the matters required by LR 56.3 is set forth in Defendant's Brief in Support.

Accordingly, Defendant respectfully requests the Court grant him summary judgment on all claims; and for such additional and further relief as deemed appropriate by this Court.

Respectfully Submitted,

s/ Aubrey "Nick" Pittman
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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2016, the foregoing pleading was filed with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

s/Wendle Van Smith
WENDLE VAN SMITH